

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
LAFAYETTE DIVISION**

2012 APR 18 AM 10:04
U.S. DISTRICT COURT
FOR THE NORTHERN DISTRICT
OF INDIANA

MIRANDA SROUFE, f/k/a
MIRANDA GREER,

Plaintiff,

v.

ZURICH AMERICAN INSURANCE
COMPANY, THE ZURICH
SERVICES CORPORATION, and
ZURICH NORTH AMERICA,

Defendants.

4:12CV0028

CAUSE NO: _____

PETITION FOR REMOVAL OF CIVIL ACTION

The Honorable Judges of the United States District Court for the Northern District of Indiana, Lafayette Division:

Defendants, Zurich American Insurance Company, The Zurich Services Corporation, and Zurich North America (hereafter, "Zurich entities"), by their undersigned attorneys, respectfully show this Court:

1. The Zurich entities are Defendants in the above-entitled action.
2. On March 20, 2012, the above-entitled action was commenced against the Defendants in the Tippecanoe Superior Court, Cause No.: 79D01-1203-MI-00002, and is now pending therein.
3. On March 27, 2012, Zurich American Insurance Company received a Summons and Complaint in the above-entitled action.

4. On April 2, 2012, Zurich North America received a Summons and Complaint in the above-entitled action.

5. On April 3, 2012, The Zurich Services Corporation received a Summons and Complaint in the above-entitled action.

6. On April 4, 2012, Valerie L. Hughs and Wandini B. Riggins of the law firm of Lewis Wagner, LLP appeared for Zurich. See **Exhibit A**.

7. No further proceedings have been had in the Tippecanoe Superior Court.

8. As required by 28 U.S.C. § 1446a, attached hereto as **Exhibit B**, are copies of process and pleadings in the removed case.

9. The amount in controversy in the above-entitled action, exclusive of interest and costs, exceeds \$75,000.00, as indicated in Plaintiff's Complaint for Declaratory Judgment, paragraph 17.

10. Plaintiff is a citizen of the state of Indiana.

11. Zurich is located at 1400 American Lane, Schaumburg, IL 60196-1056, therefore Defendants are Illinois corporations.

12. The above-entitled action is a civil action for declaratory judgment and alleged damages arising out of a coverage dispute between Plaintiff and Zurich, where the underwriting company at issue is Zurich American Insurance Company, an Illinois corporation. No other parties are named. Accordingly, by virtue of diversity jurisdiction, Defendants are entitled to removal.

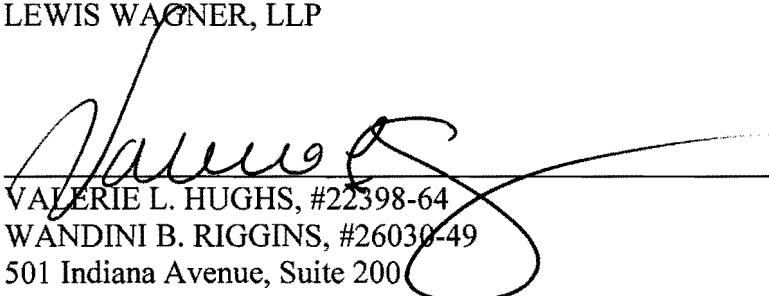
13. This Court has original diversity jurisdiction of the above-entitled action, pursuant to 28 U.S.C. § 1332, and the action may therefore be removed to this Court, pursuant to 28 U.S.C. § 1441a.

14. A copy of this Petition for Removal has been filed in the Tippecanoe Superior Court, and Plaintiff has been served with both this Petition for Removal and the Notice of Filing of Petition for Removal.

15. This Petition for Removal is being filed with this Court within 30 days after service of the Summons and Complaint on Defendants, consistent with U.S.C. § 1446.

WHEREFORE, Defendants pray that the above-entitled action be removed from the Tippecanoe Superior Court.

LEWIS WAGNER, LLP



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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all counsel of record in this case via first-class mail on the 18th day of April, 2012.

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